

January 22, 2014

Peter Brostrom
Water Use and Efficiency Branch
Division of Statewide Integrated Water Management
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-001

Subject: EBMUD's comments on the ITP's Public Draft Report to the Legislature on UWMP
Demand Management Measure Reporting and Requirements

Dear Mr. Brostrom:

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to provide comments on the Independent Technical Panel's (ITP) Public Draft Report to the Legislature on Urban Water Management Plan (UWMP) Demand Management Measure Reporting and Requirements. EBMUD also appreciates the commitment by the DWR staff and ITP in developing this report. EBMUD has been engaged through California Urban Water Agencies (CUWA) and fully concurs with CUWA's comments submitted to DWR. EBMUD would like to offer a few additional points as well.

EBMUD worked collaboratively with the University of California, Davis' Center for Water-Energy Efficiency to study the water/energy nexus and understand how energy intensity varies with the time of the year, geographically within our specific service area, and by water year type. The study found: temporal and spatial variability exist and need to be considered; data management and analysis require significant resources; and short-cut calculators can estimate energy intensity but there are monitoring and validation challenges.

While EBMUD has the capacity to handle the tremendous amount of data and analysis required under this proposal, the specific requirements and the intended purpose must be clearly defined and understood before it is made mandatory. Therefore, at this point, we strongly support the recommendation for energy intensity reporting to remain a voluntary, not mandatory, element of UWMPs. We also recommend and offer our services in support toward the California Public Utilities Commission's development of appropriate methodologies which can be used as guidance by water agencies so they receive the data they desire.

Please contact Priyanka Jain at (510) 287-1153 if you have any questions regarding our comments.

Sincerely,



Richard G. Sykes

RGS:PKJ:dec

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